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**Subject:** NW Natural, DEQ's Initial General Comments on the Draft Gasco Sediments Cleanup Site EE/CA  
**Date:** 07/17/2012 06:37 PM  
**Attachments:** [DEQ General Comments-Draft Gasco EECA-17Jul12.docx](#)

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Hello Sean.

DEQ appreciates the opportunity to provide comments on NW Natural's Draft Engineering Evaluation/Cost Analysis (Draft EE/CA) for the Gasco Sediments site dated May 2012. DEQ's initial general comments are provided in the attachment.

DEQ's comments are intended to provide EPA with the more significant general issues, deficiencies, and limitations we identified based on a preliminary review of the document. The comments provided do not represent DEQ's complete comments set. DEQ team members were not able to complete a thorough review of the Draft EE/CA in the requested timeframe. DEQ will have more detailed comments on many sections of the Draft EE/CA, including but not necessarily limited to sections related to the use and interpretations of data gaps sampling data; uplands and in-water human health and ecological risk screening criteria; and in-water and riverbank risk evaluations. Given the Gasco site is one of the largest highest priority sites in the Portland Harbor, and the EE/CA selects the first final remedy in the Superfund project, DEQ believes it is extremely important for the document to be thoroughly reviewed. Given the importance of the project, our current workload projections, and the information provided below, DEQ requests an extension of 8-12 weeks to complete a more detailed review of the document.

As you know, the draft Portland Harbor Feasibility Study (draft PHFS) and the Draft EE/CA were received from the LWG and NW Natural within essentially the same timeframe. As a result of the timing of the submittals, many important elements of the draft PHFS are fully integrated into the Draft EE/CA. DEQ has had difficulty organizing and coordinating our reviews of the Draft EE/CA as it requires simultaneous review of the draft PHFS. This has made DEQ's overall review of the Draft EE/CA inefficient. Given this information, I'm wondering if EPA can identify the portions of the Draft EE/CA that will be addressed during agency review of the draft PHFS. I'm making this request so the DEQ team can focus our more detailed review on the project-specific information contained in the Draft EE/CA. I think this could help reduce the time spent by DEQ conducting duplicative reviews of portions of the Draft EE/CA that are based on the draft PHFS (i.e., reviewing portions of the Draft EE/CA that will be addressed by agency review of the draft PHFS).

Thanks again for providing DEQ with the opportunity to provide our initial general comments and concerns on the Draft EE/CA. Please feel free to contact if you have questions regarding any of the comments provided in the attachment.

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